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*Lead Counsel for Court-Appointed Lead Plaintiff and the Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE TEZOS SECURITIES LITIGATION

This document relates to:

ALL ACTIONS.

Master File No. 17-cv-06779-RS

**CLASS ACTION**

**DECLARATION OF HUNG G. TA IN  
SUPPORT OF PLAINTIFFS' NOTICE OF  
WITHDRAWAL OF ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL**

Judge: Hon. Richard Seeborg

**DECLARATION OF HUNG G. TA**

I, HUNG G. TA, declare under penalty of perjury as follows:

1. I am the principal of the law firm Hung G. Ta, Esq. PLLC (“HGT Law”), counsel for named plaintiffs (“Plaintiffs”). I am an active member in good standing of the bar of the State of New York and have been admitted *pro hac vice* in this matter. I submit this declaration in support of Plaintiffs’ Notice to Withdraw their Administrative Motion to File their Motion for Class Certification Under Seal (“Administrative Motion”).

2. On January 9, 2019, Plaintiffs filed the Administrative Motion (Dkt. No. 187), seeking to file under seal certain exhibits to, and certain portions of the memorandum of law in support of, Plaintiffs’ Motion for Class Certification. Redacted and unredacted versions of Plaintiffs’ Motion for Class Certification were filed with the Administrative Motion.

3. On January 14, 2019, defendant Kathleen Breitman filed a Declaration Pursuant to Civil Local Rule 79-5(e) (Dkt. No. 190) (“Breitman Declaration”) setting forth reasons why certain documents filed with Plaintiffs’ Motion for Class Certification should be sealed

4. On January 15, 2019, Plaintiffs met and conferred with counsel for Defendants Dynamic Ledger Solutions, Inc., Kathleen Breitman and Arthur Breitman (collectively, the “DLS Defendants”). The DLS Defendants agreed to re-produce the documents that are the subject of the Administrative Motion with appropriate redactions to alleviate any confidentiality concerns. Therefore, these re-produced documents need not be filed under seal.

5. Accordingly, Plaintiffs hereby withdraw their Administrative Motion.

6. Plaintiffs request an order from the Court allowing Plaintiffs to re-file, without sealing, their Motion for Class Certification, *nunc pro tunc*, as of the date of the original filing, January 9, 2019.

I declare under penalty of perjury that the foregoing is true and correct, this 22nd day of January, 2019.

/s/ Hung G. Ta

Hung G. Ta